American Lamb Council

American Sheep Industry Association, Inc.
www.sheepusa.org

American Wool Council

June 24, 2005

Docket No. 05-015-1
Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road, Unit 118
Riverdale, MD 20737-1238

National Animal Identification System; Notice of Availability of a Draft Strategic Plan and Draft Program Standards

The American Sheep Industry Association (ASI) is pleased to have the opportunity to provide comments on Docket No. 05-015-1. ASI is the national trade association representing over 65,000 sheep producers in the U.S. through our state associations and other affiliates.

The sheep industry is committed to enhanced disease prevention, control and surveillance which will be accomplished through modern animal identification and tracking systems. Animal identification has been a key component of the national accelerated scrapie eradication program since it began approximately three years ago. The regulation governing this program requires that most classes of sheep (slaughter and feeder lambs are exempt) be identified prior to entering inter-state commerce. In addition, States must meet certain (Consistent-State status) criteria, which includes compliance with, and enforcement of intra-state traceability. Therefore, due to the implementation of the scrapie eradication program, the sheep industry has an animal identification system in place that largely accomplishes the goal, key components and guiding principles stated in the NAIS Draft Strategic Plan. The identification requirements of the scrapie eradication program are accomplished primarily through the use and recording of numbered ear tags but allows for other devices and marks as well as groups/lots. In the process of implementing the scrapie program, many lessons were learned regarding ear tag use, size, placement, retention and environmental effects, multi-functionality, readability and distribution.

The scrapie ID system is necessarily a visual-based tracking system for animals that is supplemented by the use of records of ownership, registry recordation and movement. Visual-based tracking systems have many recognized short-comings, two of which are opportunities for reading errors and the lack of speed with which numbers can be read and recorded. For this reason, the sheep industry is very interested in pursuing the discovery and testing of more automated, accurate and high-throughput identification systems, yet there are no proven systems available to date. The current visual system for breeding stock is adequate for the scrapie program and is the best technology has to offer at this time for individual sheep identification systems in general. Scrapie identification, as with the new NAIS, requires identification only upon movement (entering commerce, co-mingling, etc). The premise and flock assignment system works well as does the ear tag distribution system. However, for slaughter and feeder sheep (all sheep under 18 months of age and not designated as breeding animals), an individual ID system that is based upon visually read ear tags for tracking would not be suitable for accomplishing 48-hour traceability. It would take much too long to catch each animal for close inspection and record individual numbers plus the reading/recording errors would be expected to be substantial. It is worthwhile to note that major sheep producing trading partners are focusing on group/lot-based premises identification for sheep. The only practical and efficient

way to accomplish 48-hour traceability for feeder and slaughter sheep in the U.S. using current technology is to identify and record the movement of groups and lots of animals. For the foreseeable future (until a more efficacious and cost-effective system is discovered and proven), 48-hour traceability can be best accomplished for sheep by using the current scrapie ID system, inclusive of its requirements and exemptions, and overlaying a group/lot ID system (*). The principles are:

For animals outside the purview of the scrapie ID system, a group/lot would receive one GID for the group/lot. The GID would stay in effect for those animals for the life of the group/lot. Groups/lots could be combined with other animals/groups/lots, which would then constitute a new group/lot. Groups/lots could be subdivided and the subdivisions would be new groups/lots. Each group must have a recorded history from their flock of birth to the slaughter plant. Individual animals pulled out of groups/lots would receive individual IDs. Sexually intact sheep could only be pulled out of groups/lots for breeding purposes if they had premise of origin identification on them. All exhibition animals would be individually identified. As implied above, there would be no additional individual ID requirements outside of the scrapie ID system to comply with the NAIS system; the scrapie flock ID will be matched (cross-referenced) with the NAIS premises ID in the database. As an alternative level of assurance that individual sexually-intact sheep don't leave feedlots (slaughter channels) without individual premises of origin identification, APHIS could allow "designated" or "approved" feeding operations to be classified as slaughtering channels on a voluntary basis and, in doing so, agree to the restriction that all animals entering the "designated" or "approved" operation must be slaughtered. APHIS established the general precedence for the "approved" or "designated" feedlot concept in Docket No. 03-080-1: "Bovine Spongiform Encephalopathy; Minimal Risk Regions and Importation of Commodities".

In normal industry practice, most lambs are moved to large custom feedlots where owner-lot performance is tracked for business purposes. The major change in responsibility for feedlot operators would be NAIS recordation. In nearly all cases under industry practices, lambs are moved to slaughter long before they reach 18 months of age. Since the definition of "lamb" refers to sheep less than 12 months of age (determined by FSIS inspection), sheep exceeding the lamb classification when slaughtered are considered mutton and are price-discounted. Sheep products exceeding a "yearling" or "mutton" classification would enter different marketing channels than lamb, would not fit lamb fabrication standards and are thus not normally processed at major lamb slaughtering establishments.

Ear tags for the scrapie program would continue to have the scrapie flock number printed on them and would also, for the foreseeable future due to the dependence on visual number reading, use the current scrapie numbering system in lieu of a longer numbering system. Again, the scrapie number imprinted on the tags would be linked to the NAIS number in the central database.

Electronic ear tags for voluntary use would have either a premises-based individual animal number on them or the 840 numbers. For future use in the impending NAIS mandatory system, standards for sheep electronic ear tags will be developed after an electronic ID system is discovered, defined and tested.

(*) A group/lot of feeder/slaughter sheep would be defined as 10 or more animals (GID).

Examples:

- Producer Ann takes lot #AD2344 of 20 lambs born on her premises to Market A. At Market A these 20 lambs are joined with lamb lot #78000 containing 32 lambs, lamb lot #78001 containing 15 lambs, lamb lot #78002 containing 33 lambs to form a new group lot #78056 sold to lamb feeder Joe NAIS PIN 345678. (Producer Ann will record formation of lot #AD2344 of 20 lambs born on her premises and movement of that lot to market A. Likewise, each owner of the other three lots will record formation and movement of the groups/lots using the record of sale/receipt provided by market A.)

- Market A will report to NAIS formation of lot #78056 as a combined lot of lot #AD2344 of 20 lambs, lot #78000 containing 32 lambs, lamb lot #78000 containing 15 lambs, lamb lot #78002 containing 33 lambs and sale of that lot to Joe NAIS PIN 345678.

- Lamb feeder Joe unloads lot 78056 at his feedlot and divides the lot 78056 by type and condition into 4 groups of 25 each. He mixes these with other lamb lots of similar type and condition. He registers 4 new group lots with NAIS indicating the groups that were combined to make each new group. When he is sorting lambs to load for slaughter he pulls some from each of 10 lots. He reports formation of the new lot 79900 listing its component lot numbers to NAIS. The slaughter plant reports slaughter of lot 79900 to NAIS. Joe must be able to verify when all lambs from all of his purchased lots have been moved to slaughter and that all were slaughtered at less than 18 months.

Following are answers to some of the specific questions raised in the docket:

Is a mandatory identification program necessary?

It appears that a mandatory system is necessary in order to achieve the NAIS Goal. However, there have been several times in history when it has been necessary to trace animals where joint federal, State and industry efforts have performed in exemplary fashion and accomplished traceability or tracking without a mandatory system in place. Certainly achieving 48-hour traceability in each or all species reliably and without serious disruption of commerce on a large-scale basis would best be accomplished through a mandatory identification and rapid tracking system. However, mandatory identification can easily have unintended effects on industry infrastructure, especially if the marketing system is unable or unwilling to comply.

At what point and how should compliance with a requirement that producers be responsible for identification be ensured?

Overall compliance will best be assured if the following conditions are met:

- A reliable and "long-term use" identification technique has been developed and field-tested for sheep.
- Identification devices are easily and quickly available to producers at a low price.

- An education and outreach program (national, State and local levels) on what is expected of producers and why is conducted well in advance of the implementation date with measured results on people reached.
- Compliance achievements should be measured by realistic expectations by anticipated time-lines.

Compliance must go hand-in-hand with enforcement. The system for using Certificates of Veterinary Inspection for the interstate movement of livestock is well founded and serves a vital purpose in protecting animal health. Enforcement activities of compliance with producer-applied animal identification could be focused both toward livestock assembly points and auditing Health Certificates.

In what manner should compliance with identification and movement requirements (direct sales) be achieved; who should be responsible for meeting these requirements and how can the transactions be inputted?

If Certificates of Veterinary Inspection are required to have recorded NAIS animal or GID numbers, these certificates and the State Veterinarian's records system can be audited for compliance. Spot audits of records held by producers, feeders and slaughtering establishments along with database records should provide compliance and enforcement information.

Should age of animal trigger identification or should all animals be identified regardless of age when entering commerce or being commingled?

To fully achieve the NAIS Goal, all animals would need identification (either individual or group/lot). However, achieving reasonable compliance will require progress in stages, not just timelines. We believe that beginning with breeding animals, as was done with the scrapie program ID requirements, is both logical and allowed APHIS, the States and industry to address some of the more difficult issues during the gear-up phase. With sheep, it will be much easier to add group/lot identification and reporting for the majority of feeder and slaughter animals than it was to implement the individual animal ID component of the scrapie eradication program.

Are the timelines realistic?

For the sheep industry, the timeline for adding group/lot identification and recording for feeder and slaughter lambs and other minor additions as described earlier is realistic.

Should requirements be implemented across all species according to the same timeline?

Realistically, some species will be able to achieve compliance quicker than others. We believe that it is appropriate to set reasonable goals for implementing NAIS for each species and work toward livestock industry-wide implementation on a uniform compliance date that is recognized as being achievable and reasonable by each industry. If some industries would be required to implement identification systems while others would not, those required to do so could be disadvantaged. Because of the lack of long-term testing of electronic identification techniques with sheep under diverse climatic and management conditions, it appears unlikely that such an aspect of the NAIS program can be workable and successfully

implemented by 2009. It would be a mistake to force an untested identification program on an entire industry.

What are the most cost-effective ways for submitting information?

Electronic file transfer is likely the most cost-effective and fastest method provided the file formats of submitted data are compatible with database requirements. However, backup systems should always be available. It is important to realize that many producers and some markets may not have access to or the ability to use electronic input or management of data. Animal identification and tracking may be most needed at times when there are problems with communications systems---natural disasters, computing server shut-downs, transportation blockages. There should be multiple systems in place for redundancy and security, i.e. electronic (computer), phone, fax, and mail data submission. Data submission by means other than electronic, could delay entry into the database beyond the 48 hour goal.

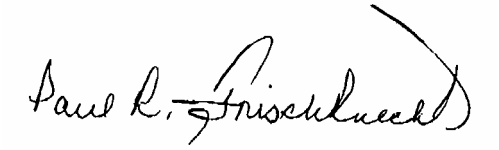
What information should be protected from disclosure?

Information that is pertinent to the animal(s) identification and movement should be available to the responsible federal and State government officials for database maintenance and for use in disease control. Information that is extra to those basic needs should be protected from disclosure.

How could USDA minimize the burden associated with the development and maintenance of records?

We believe that it is the movement of animals that should trigger the need for reporting and recordkeeping. Therefore, if a producer sells one animal or a group of animals, this information should be recorded. Likewise, if the buyer of these animals moves them from the original producers' location, the buyer should record the movement and the animals' number(s). The burden associated with the development and maintenance of records can be minimized to a large extent by incorporating NAIS requirements into existing "normal" records systems rather than creating additional or redundant systems. The handling of groups/lots of animals is discussed above.

Thank you for allowing the American Sheep Industry Association to comment on the above docket.



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